

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MARIAN H. COURTICE,

Plaintiff,

v.

No. 08-CV-719 LH-DJS

MIDLAND CREDIT MANAGEMENT, INC.; and
TRANS UNION LLC,

Defendants.

**PLAINTIFF'S MOTION TO COMPEL TRANS UNION LLC
TO ANSWER WRITTEN DISCOVERY**

Plaintiff Marian H. Courtice moves the Court to order Defendant Trans Union LLC to answer written discovery.

Trans Union opposes this motion.

Ms. Courtice files a brief in support of the motion at the same time that she files this motion. In the brief, Ms. Courtice sets forth her efforts to resolve these discovery disputes prior to the filing of this motion.

Ms. Courtice requests that the Court order Trans Union to provide full and complete responses to Interrogatories Nos. 3, 9, 16, 17 and 18 and Requests for Production Nos. 2, 9, 10, 11, 12, 15, 16, 17, 18, 19, 20, 21 and 23, consistent with the limitations agreed to by Ms. Courtice in this brief, within 10 days of the entry of the Court's order.

Respectfully submitted:

FEFERMAN & WARREN, Attorneys for Plaintiff



ROB TREINEN

300 Central Avenue SW, Suite 2000 East
Albuquerque, New Mexico 87102
(505) 243-7773
(505) 243-6663 (fax)

I CERTIFY that a true and correct copy of the foregoing pleading was mailed to James A. Askew, attorney for Defendant Midland Credit Management, Inc., at Rodey Dickason Sloan Akin & Robb PA, P.O. Box 1888, Albuquerque, New Mexico 87103; to Rodney L. Schlagel, attorney for Defendant Trans Union LLC, at Butt Thorton & Baehr PC, P.O. Box 3170, Albuquerque, New Mexico 87190; and to Tiffany L. Hawkins, attorney for Defendant Trans Union LLC, at Strasburger & Price LLP, P.O. Box 1308, 2801 Network Blvd., Suite 600, Frisco, Texas 75034, on January 7, 2009.



ROB TREINEN